

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

TOPIA TECHNOLOGY, INC.,

Plaintiff,

v.

BOX, INC., SAILPOINT
TECHNOLOGIES HOLDINGS, INC., and
VISTRA CORP.,

Defendants.

Case No. 6:21-cv-1372-ADA

JURY TRIAL DEMANDED

**DECLARATION OF ANDREW N. SAUL REGARDING DEFENDANTS SAILPOINT
AND VISTRA'S OPPOSED MOTION TO SEVER AND STAY UNDER THE
"CUSTOMER-SUIT" DOCTRINE**

1. I am an attorney and a member of the State Bar of Georgia. I am an Associate with Kilpatrick Townsend & Stockton LLP and counsel of record for Defendant SailPoint Technologies Holdings, Inc. in this litigation. I am over the age of 18 and competent to make this declaration.

2. I make this declaration on my own knowledge. If called upon to testify regarding the contents of this declaration, I could and would competently testify to its accuracy.

3. Attached as Exhibit 1 is a true and correct copy of Plaintiff Topia Technology, Inc.'s Disclosure of Preliminary Infringement Contentions and Accompanying Document Production, served April 28, 2022.

4. Attached as Exhibit 2 is a true and correct copy of Exhibit A to Plaintiff Topia Technology, Inc.'s Disclosure of Preliminary Infringement Contentions and Accompanying Document Production, served April 28, 2022.

5. I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 25, 2022, in Atlanta, Georgia.

/s/ Andrew N. Saul
Andrew N. Saul

CERTIFICATE OF SERVICE

I hereby certify that on the date below all counsel of record who are deemed to have consented to electronic service are being served with a copy of the foregoing via the Court's CM/ECF system.

Dated: July 25, 2022

/s/ Andrew N. Saul
Andrew N. Saul